

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION

IN RE:	§	
ARABELLA PETROLEUM	§	
COMPANY, LLC,	§	CASE NO. 15-70098-RBK-11
	§	
Debtor.	§	CHAPTER 11

MORRIS D. WEISS, CHAPTER 11	§	
TRUSTEE FOR ARABELLA	§	
PETROLEUM COMPANY, LLC,	§	
Plaintiff	§	
	§	
v.	§	ADV. NO. 16-07002-rbk
	§	
ARABELLA EXPLORATION INC.,	§	
ARABELLA EXPLORATION LLC,	§	
ARABELLA OPERATING LLC,	§	
TRANS-TEXAS LAND & TITLE, LLC,	§	
PLATINUM PARTNERS CREDIT	§	
OPPORTUNITIES MASTER FUND LP,	§	
PLATINUM LONG TERM	§	
GROWTH VIII, LLC, and	§	
JASON HOISAGER, Individually,	§	
Defendants	§	

UNOPPOSED MOTION TO SUBSTITUTE COUNSEL

COMES NOW Defendant, Jason Hoisager, Individually, (collectively, “Defendant”) and respectfully files this Unopposed Motion to Substitute Counsel (the “Motion”) and requests that Robert A. Simon be substituted as Counsel of Record for Defendant in place of Joseph F. Postnikoff, Law Offices of Joseph Postnikoff, PLLC, State Bar No. 16168320, 702 Houston Street, Fort Worth, Texas 76102, jpostnikoff@postnikofflaw.com. Mr. Simon has already entered an appearance in this case. Mr. Simon is an attorney licensed to practice in the State of Texas and is admitted to practice in this District. This substitution of counsel will not delay the Defendant’s

readiness to meet any of the Court's deadlines in this Adversary Proceeding and will not prejudice any party. Joseph Postnikoff has consented to the substitution. I also conferred with counsel for Plaintiff through the undersigned Certificate of Conference. Plaintiff is not opposed to the Motion.

Wherefore, Defendant requests that the Motion to Substitute Counsel be granted.

June 30, 2021

Respectfully submitted,

WHITAKER CHALK SWINDLE & SCHWARTZ PLLC

By: /s/ Robert A. Simon

Robert A. Simon
Texas Bar No. 18390000
301 Commerce Street, Suite 3500
Fort Worth, Texas 76107
Telephone: (817) 878-0543
Facsimile: (817) 878-0501
rsimon@whitakerchalk.com
ATTORNEYS FOR DEFENDANT
JASON HOISAGER

CERTIFICATE OF CONFERENCE

I hereby certify that on June 29, 2021, I conferred by telephone with Joseph F. Postnikoff, previous counsel for Defendant, regarding the proposed substitution counsel. He told me that he is not opposed. I further certify that, on June 29, 2021 I conferred by email with Mark C. Taylor, counsel for the Plaintiffs, regarding opposition to this Motion. Mr. Taylor informed me by email that he is not opposed to the Motion.

/s/ Robert A. Simon

Robert A. Simon

CERTIFICATE OF SERVICE

I hereby certify that I serve a copy of the Motion upon all parties who received electronic notification through the Court's ECF System on this 30th day of June, 2021.

/s/ Robert A. Simon

Robert A. Simon